

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS,  
EASTERN DIVISION**

ELIZABETH AWALT, as Administrator  
of the Estate of ROBERT AWALT,

Plaintiff,

v.

CORRECTIONAL HEALTHCARE  
COMPANIES, INC., and HEALTH  
PROFESSIONALS, LTD.,

Defendants.

No. 11 C 06142

Hon. Thomas M. Durkin,  
District Judge

JURY TRIAL DEMANDED

**PLAINTIFF'S PETITION FOR ATTORNEYS' FEES AND COSTS**

**EXHIBIT O**

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**DECLARATION OF SARAH GRADY**

I, Sarah Grady, declare under penalty of perjury that the following is true and correct:

1. Declarant graduated *cum laude* from Northwestern University School of Law in May 2012 with a Law and Social Policy Concentration. During law school, Declarant served as the Managing Articles Editor for the *Northwestern Journal of Criminal Law & Criminology*. She received several awards at Northwestern, including the Lowden-Wigmore Prize for Legal Writing, awarded annually to the two best student comments in the *Journal of Criminal Law & Criminology*, the Northwestern Public Service Award, awarded to the graduating student who has shown the greatest dedication and commitment to public service, the Harold Washington Leadership Award for displaying leadership during law school, and the Lowden-Wigmore Prize for placing second in the Julius H. Miner Moot Court Competition. Declarant served as the co-president of the Public Interest Law Group and Northwestern's chapter of the American Constitution Society, as vice-president of Northwestern's chapter of the ACLU, and served on the board of the Julius H. Miner Moot Court Competition and the Student Funded Public Interest Fellowships, a student group that raises money to benefit students working in public interest.

2. During law school, Declarant was heavily involved in clinical programs at Northwestern. She worked with the Roderick MacArthur Justice Center for more than two years, where she helped to investigate, research, and draft several claims of a 28 U.S.C. § 2255 petition for a federal death row prisoner, and drafted a complaint on behalf of a Guantanamo Bay detainee challenging the conditions of his

confinement. She also worked with Northwestern's Death Penalty Clinic, where she drafted a petition for a writ of *certiorari* to the U.S. Supreme Court on behalf of a man on death row in Texas. Declarant spent her second summer in law school working for the Southern Center for Human Rights, a nonprofit in Georgia that focuses on death penalty and prisoners' rights litigation. While at the Southern Center, Declarant drafted one of three claims in a habeas corpus appellate brief to the U.S. Court of Appeals for the Eleventh Circuit that secured relief for the appellant.

3. Following law school, Declarant served as a law clerk to the Honorable Matthew F. Kennelly of the U.S. District Court for the Northern District of Illinois from September 2012 through September 2013.

4. Declarant was admitted to the bar of the State of Illinois in October 2013, and the bar of the State of New York in June of 2015. Declarant is admitted to practice in the U.S. Court of Appeals for the Seventh Circuit, the U.S. District Court for the Northern District of Illinois, the U.S. District Court for the Central District of Illinois, the U.S. District Court for the Southern District of Illinois, the U.S. District Court for the Northern District of Indiana, the U.S. District Court for the Southern District of Indiana, the U.S. District Court for the Eastern District of Wisconsin, and *pro hac vice* in the U.S. District Court for the Northern District of Alabama, the U.S. District Court for the District of Minnesota, the U.S. District Court for the Northern District of Iowa, the U.S. District Court for the Southern District of Iowa, the U.S. District Court for the Eastern District of Kentucky, the U.S. District Court for the Eastern District of Missouri, and the U.S. District Court for the Western District of Missouri.

5. Since joining Loevy & Loevy in October 2013, Declarant has practiced civil rights, focusing exclusively on prisoners' rights litigation. Declarant has litigated prisoners' rights cases involving excessive force, conditions of confinement, strip searches, and the First Amendment (among others), but the vast majority of Declarant's caseload involves denials of medical care under the Eighth and Fourteenth Amendments. Declarant has represented both individual plaintiffs and large classes of thousands of prisoners bringing constitutional claims related to their current or past incarceration. Through her work representing current and former prisoners (or their loved ones), Declarant has handled all aspects of case management, including extensive motion practice, dozens of depositions, and several court hearings.

6. Declarant has published notable work on prisoners' rights. She published her Comment, *Civil Death Is Different: An Examination of a Post-Graham Challenge to Felon Disenfranchisement Under the Eighth Amendment*, in the 102nd Volume of the *Northwestern Journal of Criminal Law & Criminology*, where it was awarded the Lowden-Wigmore Prize for Legal Writing. Declarant also helped to



draft an amicus brief on behalf of former corrections administrators and experts in support of the petitioner in *Kingsley v. Hendrickson*, No. 14-6368. The Supreme Court favorably cited the amicus brief in its opinion siding with the petitioner and holding that pretrial detainees' claims of excessive force are governed by an objective standard.

7. Declarant has earned a reputation both in the legal community and the jail/prison community as an expert in prisoners' rights. Declarant devotes a substantial amount of her time consulting with attorneys appointed to represent prisoners, advising them on issues ranging from service on correctional staff to retaining correctional experts to litigating *Monell* claims against jails, prisons, and private healthcare corporations. In early 2015, Declarant created a prisoners' rights e-mail listserv for prisoners' rights practitioners and attorneys appointed to represent prisoners to learn about relevant caselaw and news and to exchange information. Declarant moderates the listserv and regularly updates its members on relevant Seventh Circuit opinions. Declarant has also been recruited as counsel in multiple cases by the U.S. District Court for the Central District of Illinois.

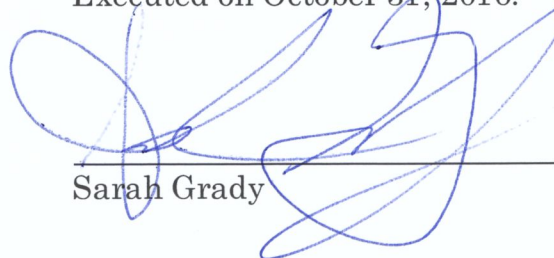
8. Declarant has given several presentations on the topic of prisoners' rights, including a presentation to attorneys appointed to prisoners' cases as part of the U.S. District Court for the Northern District of Illinois's litigation seminar series, and a presentation on litigating damages claims to prisoners' rights practitioners at the UCLA Prisoners' Advocates Conference.

9. Declarant's hourly rate is \$315.00. This rate is commensurate with rates charged by attorneys of like experience and skill practicing in this area, and it is \$10 per hour less than the *Laffey* Matrix for fee-shifting cases in the District of Columbia.

10. Declarant has reviewed the billing records for her time spent on this matter. Those records are a fair and accurate depiction of the time Declarant spent working on this case and are reasonable in terms of the time spent on each task.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 31, 2016.



Sarah Grady